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Chintan K. Amin
Senior Counsel
Corporate Law

September 24, 2012

VIA ELECTRONIC MAIL AND OVERNIGHT DELIVERY

Ms. Cynthia Brown
Removal Enforcement Coordinator
Superfund Enforcement Assessment Section (6SF-TE)
U.S. EPA, Region 6
1445 Ross Avenue
Dallas, Texas 75202-2733

**Re: US Oil Recovery Superfund Site, Pasadena, Harris
County, Texas
August 20, 2012 General Notice of Liability Letter**

Bayer Corporation
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Ground Floor
Pittsburgh, PA 15205-9741

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Dear Ms. Brown:

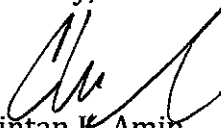
We are writing in response to the referenced CERCLA General Notice Letter (the "**GNL**") that we received on August 24, 2012. EPA states in the GNL that it "believes that Bayer CropScience may be liable under Section 107(a) of CERCLA with respect to the Site as a prior owner and/or operator of the Site." In Enclosure A to the GNL, EPA further alleges that "Bayer CropScience may be responsible for the presence of hazardous substances found at the Site." At the outset, please note that in this response, "**Bayer CropScience**" refers to the particular legal entity known as Bayer CropScience Inc., which is an affiliate of but not a subsidiary of Bayer Corporation.

In the GNL, the "**Site**" is defined to include "two parcels of land - one located at 400 North Richey Street and one at 200 North Richey Street, in Pasadena, Harris County, Texas." Please note that the named predecessor of Bayer CropScience, Chipman Chemical Company (f/k/a Chipman Chemical Engineering Company) (collectively, "**Chipman**") had no ownership or operational history at the 200 North Richey Street parcel.

Bayer CropScience understands that EPA and a number of private parties have undertaken environmental response actions at the Site. However, it is not currently clear how or whether such actions relate to environmental impacts alleged to have been caused by Chipman or during Chipman's ownership of the 400 North Richey Street parcel. There may be technical or other data in EPA's possession, or in the possession of other parties, that could shed additional light on this matter, but they have not been provided to Bayer CropScience. Therefore, without admitting any liability or waiving any available defenses, Bayer CropScience is prepared to negotiate in good faith with respect to the cleanup of the Site and with respect to reimbursing past and future costs incurred by the United States associated with CERCLA response actions at the Site.

Please contact me to discuss the next steps in connection with this site.

Sincerely,



Chintan K. Amin
Sr. Counsel
Bayer Corporation

cc: Linda Feuss, Esq.
Mr. Robert Lockemer